

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR and NATALIE
ANDERSON,
Plaintiffs

Vs.

CASE NO.: 1:25-CV-00251

CRAIG DONAIS, RUSSELL HILLIARD,
DONAIS LAW OFFICES PLLC,
MARY K. DONAIS, UPTON HATFIELD
and AMY MESSER,
Defendants

**EMERGENCY MOTION OF DEFENDANTS CRAIG S. DONAIS, MARY K. DONAIS
AND DONAIS LAW OFFICES PLLC'S TO
EXTEND TIME TO FILE A RESPONSE TO PLAINTIFF'S AMENDED COMPLAINT**

Craig S. Donais, Mary K. Donais, and Donais Law Offices PLLC (the "Donais Defendants"), by their attorneys, hereby moves on an emergency basis for an extension of time to respond to Plaintiff's Amended Complaint (Doc. 13).

1. On June 3, 2025, Plaintiff filed the instant complaint in Hillsborough Superior Court, Northern District. *See Doc. 1.1*
2. On July 2, 2025, Defendants removed this matter to this Court. *See Doc. 1.*
3. On July 8, 2025, Defendants filed their Motion to Dismiss. *See Doc. 2.*
4. On July 29, 2025, Plaintiff filed an Amended Complaint. *See Doc. 13.* The Amended Complaint added one plaintiff, two defendants, and 14 counts. Since a responsive pleading is due August 12, 2025, Defendants file this motion for an extension of time to respond to this Amended Complaint on an emergency basis.

5. On August 1, 2025, Plaintiffs filed a Notice of Errata to First Amended Complaint.
See Doc. 14.

6. Also on August 1, 2025, Plaintiffs filed a Motion to Remand. *See Doc. 15.*

7. Counsel requests until September 3, 2025 to review the 82-page amended complaint with their clients and prepare a Response to the Plaintiff's Amended Complaint.

8. Counsel for Defendants contacted Plaintiffs to request assent. Plaintiffs responded with several inquiries via email. After undersigned counsel responded, Defendants did not obtain Plaintiffs position on this motion.

WHEREFORE, Defendants respectfully requests this Honorable Court:

A. Grant this Motion for Extension to Time to File a Response to Plaintiff's Amended Complaint until September 3, 2025; and

B. Grant such other and further relief as is reasonable and just.

Respectfully submitted,

FOR THE DEFENDANTS,
CRAIG DONAIS, DONAIS LAW OFFICES
PLLC and MARY K. DONAIS

/s/ Linda M. Smith

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing to all parties in this action by serving same via electronic mail to:

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Date: August 11, 2025

/s/ Linda M. Smith

Linda M. Smith